

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Vandroth Backus, Willie Harrison Brown,  
Charlesann Buttone, Booker Manigault,  
Edward McKnight, Moses Mims, Jr.,  
Roosevelt Wallace, and William G. Wilder, on  
behalf of themselves and all other similarly  
situated persons,

Plaintiffs,

vs.

The State of South Carolina, Nikki R. Haley, in  
her capacity as Governor, John E. Courson, in  
his capacity as President Pro Tempore of the  
Senate, Robert W. Harrell, Jr., in his capacity  
as Speaker of the House of Representatives,  
Marci Andino, in her capacity as Executive  
Director of the Election Commission, John H.  
Hudgens, III, Chairman, Nicole S. White,  
Marilyn Bowers, Mark Benson, and Thomas  
Waring, in their capacity as Commissioners of  
the Election Commission,

Defendants.

Civil Action No. 3:11-cv-03120-PMD-HFF-MBS

**RESPONSE TO PLAINTIFFS' MOTION  
FOR RELIEF FROM JUDGMENT AND  
ORDER**

Now comes Defendant John E. Courson ("Defendant Courson"), in his capacity as President Pro Tempore of the Senate of the State of South Carolina, in response to Plaintiffs' Motion for Relief from Judgment and Order. Defendant Courson does not submit a substantive response to Plaintiffs' Motion because doing so would not meaningfully aid the Court in its consideration of this matter.

Plaintiffs originally challenged the redistricting plan enacted for the South Carolina Senate, however, they abandoned their challenge to the Senate redistricting plan by filing an amended complaint omitting those claims. Thus, the trial in the district court pertained only to

the redistricting plans for the South Carolina House of Representatives and United States Congress. In addition, Plaintiffs' Motion for Relief from Judgment and Order concerns only the House redistricting plan. The South Carolina Senate deferred to Defendant Harrell's defense of the House redistricting plan during the proceedings below and intends to do so here unless otherwise directed by this Court.

Respectfully submitted,

s/ William W. Wilkins

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*Tempore of the Senate*

September 13, 2013  
Greenville, South Carolina